

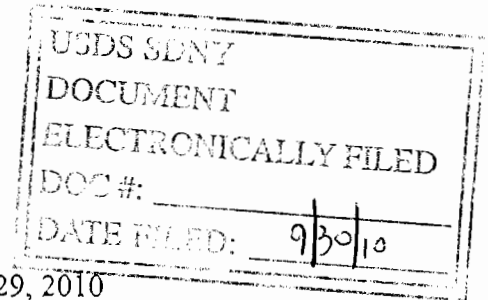
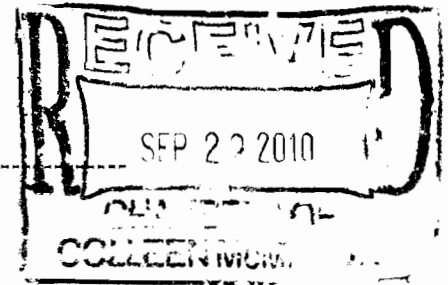
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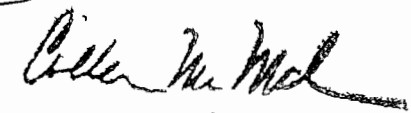
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MEMO ENDORSED



September 29, 2010

BY FACSIMILE ONLY TO (212) 805-6326Honorable Colleen McMahon, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10005Re: *Chechele v. Joffe, et al.*
10 CIV 6747 (CM)(JLC)

9/30/10

Dear Judge McMahon:

We represent the individual defendants herein, Stephen N. Joffe, Craig P.R. Joffe and Alan H. Buckley (the "Individual Defendants"). I am attaching a copy of our Notice of Appearance, which we filed electronically earlier today.

The Individual Defendants wish to move in lieu of answer. The grounds for the motion are lack of *in personam* jurisdiction, improper venue and inconvenient forum. Hence, we will be requesting dismissal or transfer of the case to the United States District Court, Southern District of Ohio, Western Division.

We have been in contact with attorneys for Plaintiff and wish to jointly propose the following briefing schedule to Your Honor:

1. The Individual Defendants shall file and serve the above motion on or before October 20, 2010;

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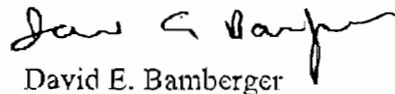
2. Plaintiff shall file and serve her opposition papers, if any, on or before November 10, 2010; and
3. The Individual Defendants shall file and serve their reply papers, if any, on or before November 23, 2010.

Unless we hear that the foregoing is unacceptable to the Court, we will file a Stipulation and Order executed on behalf of the parties memorializing the foregoing very shortly.

The parties will, of course, also file their Civil Case Management Plan on or by October 15, 2010, and expect to appear in Court on December 23, 2010, in accordance with Your Honor's Order Scheduling Initial Pretrial Conference dated September 15, 2010.

Thank you.

Respectfully submitted,


David E. Bamberger

Enclosure

cc: James A. Hunter, Esq.
Hunter & Kmiec
Attorneys for Plaintiff
(by facsimile to 646 462 3356 and
by electronic mail hunter@hunterkmiec.com)
(w/ cc encl.)